

Larry R. & Ellen M. Kramer
101 South College Street
Myerstown, PA 17067
(717) 866-5425

August 21, 2020

VIA EMAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

In Re: Larry R. Kramer & Ellen M. Kramer v. Metropolitan Edison Company
Docket No. C-2017-2630621

Dear Madam Secretary:

Attached is our Response to Met-Ed's Answer to our Reconsideration of Interim Order
by email as instructed at the hearing.

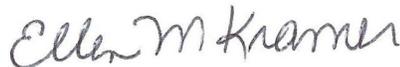
This document has been served as shown in the Certificate of Service.

Please feel free to contact us with any questions.

Sincerely,



Larry R. Kramer



Ellen M. Kramer

cc as per Certificate of Service
ALJ Jeffrey A. Watson
Respondent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Larry R. Kramer and	:	
Ellen M. Kramer	:	
	:	
v.	:	Docket No. C-2017-2630621
	:	
Metropolitan Edison Company	:	

**RESPONSE TO MET-ED'S ANSWER TO
RECONSIDERATION OF INTERIM ORDER**

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON:

As the Complainants in the above-mentioned case, we are responding to Met-Ed's answer to our above referenced document regarding your August, 2020 Interim Order,

Larry R. and Ellen M. Kramer ("the Complainants") hereby file this Response to Metropolitan Edison Company ("Met-Ed" or the "Company") pursuant to the Pennsylvania Public Utility Commission's ("Commission") regulations at 52 Pa. Code §5. 61 and §5.103(c).

I. INTRODUCTION

A. We hereby enter our background as stated in prior documents which correct the errors and omissions of Met-Ed's background in this case.

II. RESPONSE TO MET-ED'S ANSWER

B. In their documents and at the June 29, 2020 hearing, Met-Ed conveniently have been ignoring our serious vision issues such that we have been actively researching how to file an Americans with Disabilities Act Complaint against them. In our request for the presiding officer to be recused from this case, we submitted an affidavit swearing to the fact that we both have vision issues. Met-Ed still does not acknowledge this.

C. At the June 29, 2020 hearing, Your Honor granted us until August 14, 2020 to submit:

1. Objections to Met-Ed's Exhibits; and,
2. Copies of any exhibits which we were unable to do earlier.
 - a. We were unable to "identify" exhibits which we thought was mentioning them by title because of the sheer volume of documents that needed to be reviewed.
 - b. As stated at the hearing, some were in binders, some were loose and stacked among and near our PUC documents, some were not yet printed off but were in an archived list of websites. At the time, if asked, we would have guessed that list of websites was about 7-8 pages. However, it was twenty-two (22) pages in length with numbers of websites on each page. Not every website contained documents that we wished to submit. There was no conceivable way that we could 'identify' or review those documents, only some of which were in our possession and were not near the phone.
 - c. Therefore, we needed to review the documents over a period of weeks outside of a telephonic hearing.
 - d. We understood that Met-Ed additionally would need to review those documents. At the time of the hearing, there was no conceivable way that the parties could do that review of documents.
 - e. Met-Ed has staff to review their documents which they can reuse in hearing after hearing. We do not have a staff, and we have not had

sufficient time to organize this volume of documents as this case has developed.

- f. At the time of the hearing, there was no conceivable way that we could have reviewed all of the online documents besides documents in binders and stacked somewhere with our other PUC documents.
- g. At the time of the hearing, there was no conceivable way that we could handle the visual stress of reviewing thousands of pages nor was there sufficient time to do so. It would have been inhumane and impractical to do so.
- h. Met-Ed has been focusing on how long it has been since our Complaint was filed rather than focusing on what is needed for due process to occur in this case.
- i. For all of these reasons, we legitimately requested a delay in the hearing. Met-Ed has been ignoring our legitimate visual issues and has been unwilling to allow that to be accommodated. They additionally refuse to acknowledge the volume of documents which we wished to have entered into the record. To date, we have only been able to “identify” three documents which we wish to submit. Time has not allowed us to get through the remaining documents because of our visual limitations.

D. Met-Ed’s recent objections stated that the only post-hearing submissions were due on July 20, 2020. Now suddenly in their most recent filing, they recall our

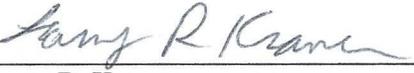
submission of Objections to their exhibits being due on August 14 and their responses due on August 31.

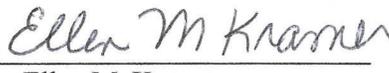
- E. The presiding officer also granted us the ability to submit late-filed exhibits on August 14, 2020. Again however, we requested an extension due to vision limitations. It took some time to get through Met-Ed's 258 pages of exhibits and to write our objections. We were not able to complete our review of our possible exhibits by that date as well. Therefore, we requested additional time until September 15, 2020 to submit our exhibits. This was due in part to both of our vision issues which Met-Ed does not want to have accommodated.

III. CONCLUSION

THEREFORE, we request that

- F. Met-Ed be required to accept the rulings of the hearing allowing the submission of late-filed exhibits.
- G. The original ruling from the June 29, 2020 hearing that our exhibits which were due on August 14, 2020 be extended until September 15, 2020.
- H. The briefing schedule be extended accordingly.


Larry R. Kramer


Ellen M. Kramer

August 21, 2020

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Larry R. Kramer and :
Ellen M. Kramer :
v. : Docket No. C-2017-2630621
Metropolitan Edison Company :

Certificate of Service

We hereby certify that we have this day served a true copy of the enclosed Response to Met-Ed's Answer to Reconsideration of Interim Order upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by email as follows:

Lauren M. Lepkoski
Tori L. Giesler
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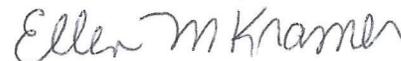
Dan Pallas assistant of ALJ Watson
dpallas@pa.gov

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
rchiavetta@pa.gov

Dated: August 21, 2020



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Ellen M. Kramer